

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CARLETON
NELSON; CASEY KIRSCHNER;
ALLCORE DEVELOPMENT LLC;
FINBRIT HOLDINGS LLC; CHESHIRE
VENTURES LLC; 2010 IRREVOCABLE
TRUST; SIGMA REGENERATIVE
SOLUTIONS LLC; CTBSRM, INC.;
RODNEY ATHERTON; DEMETRIUS VON
LACEY; RENRETS LLC,

Defendants.

CASE NO. 1:20-CV-484-RDA-IDD

800 HOYT LLC,

Intervening Interpleader
Plaintiff, Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants,
Interpleader Counter-Plaintiffs.

**PLAINTIFFS' RESPONSE TO WATSON
DEFENDANTS' MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5(C), Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (“Amazon”) respectfully submit this response to the Watson Defendants’ Motion to File Documents Under Seal. Dkt. 1456 (the “Motion”).

The Motion seeks permission to file three documents temporarily under seal: two exhibits that were filed with the Watson Defendants’ response to Amazon’s motion to terminate the receivership, *see* Dkts. 1458-1 (Bodner Decl. Ex. B), 1458-2 (Bodner Decl. Ex. C); and an unredacted version of the Watson Defendants’ response to Amazon’s motion to terminate the receivership that quotes from, and references, the two exhibits, *see* Dkt. 1458 (unredacted response). Amazon designated the two exhibits as “Confidential” under the Protective Order entered in this case. *See* Dkt. 55. The Motion disputes that these documents should remain under seal. Mot. 2. To avoid burdening the Court and parties with additional litigation, Amazon does not object to the two exhibits, and the unredacted response that references them, being unsealed and placed on the public docket. Pursuant to Local Civil Rule 5(C), Amazon also respectfully submits a proposed order concurrently with this response.

Dated: December 1, 2023

Respectfully submitted,

/s/ Michael R. Dziuban

Elizabeth P. Papez (*pro hac vice*)

Patrick F. Stokes (*pro hac vice*)

Jason J. Mendro (*pro hac vice*)

Claudia M. Barrett (*pro hac vice*)

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*Counsel for Plaintiffs Amazon.com, Inc. and
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CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

CTBSRM, Inc.
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s/ Michael R. Dziuban

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